

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

The Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
TIFFANY M. ANDRAS, ESQ.**

I, Tiffany M. Andras, Esq., certify as follows:

1. I am an attorney with the law firm Greenberg Traurig, LLP, and am an attorney of record in the above-captioned litigation representing Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc.

2. I make this Certification based on personal knowledge and in support of the following memoranda concurrently filed by various Defendants: (i) Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification of Consumer Economic Loss Claims; (ii) Defendants' Opposition to Plaintiffs' Motion for Class Certification of Third-Party Payor Claims; (iii) Defendants' Memorandum of Law in Opposition To Medical Monitoring Plaintiffs' Motion for Class Certification; and (iv) Opposition of Wholesaler Defendants to Plaintiffs' Motion for Class Certification of the Consumer and Third-Party Payor Economic Loss Claims (collectively, "Defendants' Class Certification Opposition Briefs").

3. Attached hereto as **Appendix A** is an Index of Defense Opposition Exhibits which relates to the exhibits filed as attachments to this Certification that are cited throughout Defendants' Class Certification Opposition Briefs or in the appendices attached thereto.

4. Attached hereto as Exhibit 1 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Marlin Anderson, dated December 10, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Amended Confidentiality and Protective Order [ECF 1661] (the “Protective Order”).¹

5. Attached hereto as Exhibit 2 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Alphonse Borkowski, dated May 18, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

6. Attached hereto as Exhibit 3 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Billy Joe Bruner, dated May 7, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

7. Attached hereto as Exhibit 4 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Gary Burnett, dated March 9, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

8. Attached hereto as Exhibit 5 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Joseph Cacaccio, dated June 16, 2021. This document

¹ With limited exceptions, for the majority of the putative class representatives, Plaintiffs failed to timely designate portions of those deposition transcripts as confidential as required by the applicable Confidentiality and Protective Order. *See* ECF 139, ¶ 17(B) (“If no party or deponent timely designates PROTECTED INFORMATION in a transcript, **none of the transcript will be treated as confidential.**”); ECF 1661, ¶ 17(B) (emphasis added). Due to Plaintiffs’ failure to make specific designations to preserve confidentiality with respect to certain deposition transcripts, Defendants have filed all deposition transcripts for putative class representatives under seal in an abundance of caution in order to ensure that no PHI is inadvertently disclosed. However, by doing so, Defendants do not concede or admit to the confidentiality of any portions of those deposition transcripts.

has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

9. Attached hereto as Exhibit 6 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Samuel Cisneros, dated December 3, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

10. Attached hereto as Exhibit 7 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Glenda Cooper, dated December 17, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

11. Attached hereto as Exhibit 8 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Linda Crocker, dated November 16, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

12. Attached hereto as Exhibit 9 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff John Duffy, dated February 9, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

13. Attached hereto as Exhibit 10 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Eric Erwin, dated January 19, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

14. Attached hereto as Exhibit 11 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Leland Gildner, dated February 4, 2021. This document

has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

15. Attached hereto as Exhibit 12 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Dennis Kaplan, dated April 2, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

16. Attached hereto as Exhibit 13 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Joseph Kessinger, dated December 29, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

17. Attached hereto as Exhibit 14 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Jynona Lee, dated March 3, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

18. Attached hereto as Exhibit 15 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Veronica Longwell, dated January 26, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

19. Attached hereto as Exhibit 16 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Flora McGilvery, dated February 11, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

20. Attached hereto as Exhibit 17 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Mary McLean, dated December 14, 2021. This

document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

21. Attached hereto as Exhibit 18 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Ronald Molinaro, dated February 17, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

22. Attached hereto as Exhibit 19 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Cheryl Mullins, dated March 30, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

23. Attached hereto as Exhibit 20 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Talsie Neal, dated January 29, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

24. Attached hereto as Exhibit 21 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Gerald Nelson, dated February 26, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

25. Attached hereto as Exhibit 22 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Robin Roberts, dated February 2, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

26. Attached hereto as Exhibit 23 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Lawrence Semmel, dated February 2, 2021. This

document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

27. Attached hereto as Exhibit 24 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Brian Wineinger, dated March 16, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

28. Attached hereto as Exhibit 25 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Brittney Means, dated October 15, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

29. Attached hereto as Exhibit 26 is a true and accurate copy of the transcript of the deposition of Economic Loss Plaintiff Merilyn Andre, dated November 30, 2021. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

30. Attached hereto as Exhibit 29 is a true and accurate copy of the transcript of the deposition of Margaret Finn, dated May 5, 2021, taken in the capacity as a representative witness for Third-Party Payor Plaintiff MSP Recovery Claims Series, LLC and its assignors (Emblem and ConnectiCare) pursuant to Federal Rule of Civil Procedure 30(b)(6). This document has been filed with redactions to the extent that it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

31. Attached hereto as Exhibit 30 is a true and accurate copy of the transcript of the deposition of Jorge Lopez, dated April 29, 2021, taken in the capacity as a representative witness for Third-Party Payor Plaintiff MSP Recovery Claims Series, LLC pursuant to Federal Rule of Civil Procedure 30(b)(6). This document has been filed with redactions to the extent

that it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

32. Attached hereto as Exhibit 31 is a true and accurate copy of the transcript of the deposition of Thomas Brown, dated May 28, 2021, taken in the capacity as a representative witness for Third-Party Payor Plaintiff Maine Auto Dealers Association pursuant to Federal Rule of Civil Procedure 30(b)(6).

33. Attached hereto as Exhibit 32 is a true and accurate copy of the transcript of the deposition of Patricia Cobb, dated October 21, 2021, taken in the capacity as a representative witness for Anthem Health Plans of Maine pursuant to Federal Rule of Civil Procedure 30(b)(6).

34. Attached hereto as Exhibit 33 is a true and accurate copy of the transcript of the deposition of Medical Monitoring Plaintiff John Judson, dated February 8, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

35. Attached hereto as Exhibit 34 is a true and accurate copy of the transcript of the deposition of Medical Monitoring Plaintiff Paulette Silberman, dated March 22, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

36. Attached hereto as Exhibit 35 is a true and accurate copy of certain pharmacy records of Economic Loss Plaintiff Linda Crocker that were produced in this litigation and marked as Exhibit 2 at the Deposition of Linda Crocker, with relevant transactions highlighted. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

37. Attached hereto as Exhibit 36 is a true and accurate copy of certain pharmacy records of Economic Loss Plaintiff Eric Erwin that were produced in this litigation, Bates stamped ERWIN000001 to ERWIN000006, and marked as Exhibit 10 at the Deposition of Eric Erwin, with relevant transactions highlighted. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

38. Attached hereto as Exhibit 37 is a true and accurate copy of certain pharmacy records of Economic Loss Plaintiff Leland Gildner that were produced in this litigation and marked as Exhibit 4 at the Deposition of Leland Gildner, with relevant transactions highlighted. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

39. Attached hereto as Exhibit 38 is a true and accurate copy of certain pharmacy records of Economic Loss Plaintiff Asha Lamy that were produced in this litigation and marked as Exhibit 5 at the Deposition of Asha Lamy, with relevant transactions highlighted. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

40. Attached hereto as Exhibit 39 is a true and accurate copy of certain pharmacy records of Economic Loss Plaintiff Robin Roberts that were produced in this litigation, bates stamped ROBERTS000006 to ROBERTS000015 and which is an excerpt of the document marked as Exhibit 12 at the Deposition of Robin Roberts. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

41. Attached hereto as Exhibit 40 is a true and accurate copy of the Administrative Services Agreement and associated amendments entered into by the Maine Automobile

Dealers Association Insurance Trust and Anthem Health Plans of Maine, Inc. that was produced in this litigation, and marked as Exhibit 2 at the Deposition of Patricia Cobb comprised of documents bates stamped MADA000128 to MADA000327 and ATM_MADA_SUBP_00002229 to ATM_MADA_SUBP_00002258. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

42. Attached hereto as Exhibit 41 is a true and accurate copy of a certain Assignment Agreement entered into by SummaCare, Inc. and MSP Recovery, LLC that was produced in this litigation and bates stamped MSP 0001152 to MSP 0001172. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

43. Attached hereto as Exhibit 42 is a true and accurate copy of certain pharmacy records of Economic Loss Plaintiff John Duffy that were produced in this litigation, bates stamped WALGREENS-DUFFY_0000062 to WALGREENS-DUFFY_0000095, and marked as Exhibit 13 at the Deposition of John Duffy, with relevant transactions highlighted. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

44. Attached hereto as Exhibit 43 is a true and accurate copy of certain pharmacy records of Economic Loss Plaintiff Ronald Molinaro that were produced in this litigation, bates stamped RMolinaro-CVS-000025 to RMolinaro-CVS-000029, and marked as Exhibit 5 at the Deposition of Ronald Molinaro, with relevant transactions highlighted. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

45. Attached hereto as Exhibit 44 is a true and accurate copy of the Maine Automobile Dealers Association Insurance Trust Group Medical Plan that was produced in this litigation, bates stamped MADA000456 to MADA000547 and marked as Exhibit 3 at the Deposition of Patricia Cobb.

46. Attached hereto as Exhibit 47 is a true and accurate copy of the transcript of the deposition of Plaintiff's Expert Rena Conti, Ph.D., on February 10, 2022 (Day 1).

47. Attached hereto as Exhibit 48 is a true and accurate copy of the transcript of the deposition of Plaintiff's Expert Rena Conti, Ph.D., on February 11, 2022 (Day 2). This document has been filed with redactions to the extent it contains information that has been designated as "PROTECTED INFORMATION" as defined in the Protective Order.

48. Attached hereto as Exhibit 49 is a true and accurate copy of the transcript of the deposition of Plaintiff's Expert Laura Craft, on February 18, 2022. This document has been filed with redactions to the extent it contains information that has been designated as "PROTECTED INFORMATION" as defined in the Protective Order.

49. Attached hereto as Exhibit 50 is a true and accurate copy of the transcript of the deposition of Plaintiff's Expert Edward Kaplan, M.D., on January 19, 2022.

50. Attached hereto as Exhibit 51 is a true and accurate copy of the transcript of the deposition of Plaintiff's Expert Kali Panagos, Pharm. D., R.Ph., on January 21, 2022.

51. Attached hereto as Exhibit 52 is a true and accurate copy of the transcript of the deposition of Plaintiff's Expert Ron Najafi on February 3, 2022.

52. Attached hereto as Exhibit 53 is a true and accurate copy of a document produced in this litigation and identified by bates range TEVA-MDL2875-00549865 to TEVA-MDL2875-00549886. This document has been filed under seal because it contains information that has been designated as "PROTECTED INFORMATION" as defined in the

Protective Order.

53. Attached hereto as Exhibit 54 is a true and accurate copy of a document produced in this litigation in native format and identified by beginning bates number TEVA-MDL2875-00731926. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

54. Attached hereto as Exhibit 55 is a true and accurate copy of a document produced in this litigation in native format and identified by beginning bates number TEVA-MDL2875-00765603. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

55. Attached hereto as Exhibit 56 is a true and accurate copy of a document produced in this litigation and identified by bates range TEVA-MDL2875-0048605 to TEVA-MDL2875-0048609. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

56. Attached hereto as Exhibit 57 is a true and accurate copy of a document that was produced in native format in this litigation and identified by bates number TEVA-MDL2875-00048612. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

57. Attached hereto as Exhibit 58 is a true and accurate copy of a document that was produced in native format in this litigation and identified by bates number TEVA-MDL2875-00048613. This document has been filed under seal because it contains information

that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

58. Attached hereto as Exhibit 59 is a true and accurate copy of a document produced in this litigation and identified by bates range TEVA-MDL2875-00539082 to TEVA-MDL2875-00539087. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

59. Attached hereto as Exhibit 60 is a true and accurate copy of a document produced in this litigation and identified by bates range TEVA-MDL2875-00539061 to TEVA-MDL2875-00539066. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

60. Attached hereto as Exhibit 61 is a true and accurate copy of a document produced in this litigation in native format and identified by bates number MYLAN-MDL2875-00895544. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

61. Attached hereto as Exhibit 62 is a true and accurate copy of a document produced in this litigation and identified by bates number bates stamped MYLAN-MDL2875-00380695 to MYLAN-MDL2875-00380699. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

62. Attached hereto as Exhibit 63 is a true and accurate copy of a document produced in this litigation and identified by bates range APL-MDL_2875-0023627 to APL-

MDL_2875-0023841. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

63. Attached hereto as Exhibit 64 is a true and accurate copy of a document produced in this litigation and identified by bates range APL-MDL 2875-0004189 to APL-MDL2875 0004261. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

64. Attached hereto as Exhibit 65 is a true and accurate copy of a document produced in this litigation and identified by bates range APL-MDL_2875-2702839 to APL-MDL_2875-2702875. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

65. Attached hereto as Exhibit 66 is a true and accurate copy of a document produced in this litigation and identified by bates range APL-MDL_2875-2707753 to APL-MDL_2875-2707906. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

66. Attached hereto as Exhibit 67 is a true and accurate copy of a document produced in this litigation and identified by bates number HETERO_USA000028000. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

67. Attached hereto as Exhibit 68 is a true and accurate copy of a document produced in this litigation and identified by bates number HETERO_USA000025248. This

document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

68. Attached hereto as Exhibit 69 is a true and accurate copy of a document produced in this litigation and identified by bates number HETERO_USA000025250. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

69. Attached hereto as Exhibit 70 is a true and accurate copy of a document produced in this litigation and identified by bates number HETERO_USA000025251. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

70. Attached hereto as Exhibit 71 is a true and accurate copy of a document produced in this litigation and identified by bates range HETERO_USA000027906 to HETERO_USA000027908. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

71. Attached hereto as Exhibit 72 is a true and accurate copy of a document produced in this litigation and identified by bates range HLL01033030 to HLL01033035. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

72. Attached hereto as Exhibit 73 is a true and accurate copy of a document produced in this litigation and identified by bates number HLL01179644. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

73. Attached hereto as Exhibit 74 is a true and accurate copy of a document

produced in native format in this litigation and identified by bates number HLL0869156, and marked as Exhibit 5 in native Excel format at the May 19, 2021 deposition of Ronald Cerminaro. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

74. Attached hereto as Exhibit 75 is a true and accurate copy of a document produced in this litigation and identified by bates range ZHP00002079 to ZHP00002132. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

75. Attached hereto as Exhibit 76 is a true and accurate copy of a document produced in this litigation and identified by bates range ZHP00009256 to ZHP00009558. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

76. Attached hereto as Exhibit 77 is a true and accurate copy of a document produced in this litigation and identified by bates range PRINSTON00074186 to PRINSTON00074515. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

77. Attached hereto as Exhibit 78 is a true and accurate copy of the Declaration of Thomas S. Moffatt, dated March 29, 2022, submitted in this litigation on behalf of CVS Pharmacy, Inc.

78. Attached hereto as Exhibit 79 is a true and accurate copy of a document produced in this litigation and identified by bates number WALGREENS0001048.

79. Attached hereto as Exhibit 80 is a true and accurate copy of a document produced in this litigation and identified by bates number TORRENT-MDL2875-00143643.

80. Attached hereto as Exhibit 81 is a true and accurate copy of a document produced in this litigation and identified by bates number TORRENT-MDL2875-00145456.

81. Attached hereto as Exhibit 82 is a true and accurate copy of a document produced in this litigation and identified by bates number TORRENT-MDL2875-00004228.

82. Attached hereto as Exhibit 83 is a true and accurate copy of a document produced in this litigation and identified by bates number TORRENT-MDL-2875-00523108.

83. Attached hereto as Exhibit 84 is a true and accurate copy of a document produced in this litigation and identified by bates number TORRENT-MDL2875-00523106. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

84. Attached hereto as Exhibit 85 is a true and accurate copy of a document produced in this litigation and identified by bates range TEVA-MDL2875-00565758 to TEVA-MDL2875-00565764 which was marked at the deposition of Roger Williams on February 17, 2022 as Exhibit 3. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

85. Attached hereto as Exhibit 89 is a true and accurate copy of the transcript of the deposition of Daniel Barreto, on April 14, 2021 (“Vol. I”). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

86. Attached hereto as Exhibit 90 is a true and accurate copy of the transcript of the deposition of Jens Nassall, on June 30, 2021. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

87. Attached hereto as Exhibit 91 is a true and accurate copy of the transcript of the deposition of Richard Derek Glover, on March 9, 2021 (“Vol. I”). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

88. Attached hereto as Exhibit 92 is a true and accurate copy of the transcript of the deposition of Antony Raj Gomas, on April 9, 2021. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

89. Attached hereto as Exhibit 93 is a true and accurate copy of the transcript of the deposition of Jun Du, on May 28, 2021. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

90. Attached hereto as Exhibit 94 is a true and accurate copy of the transcript of the deposition of Lihong Lin, on May 5, 2021. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

91. Attached hereto as Exhibit 95 is a true and accurate copy of the transcript of the deposition of Dawn Chitty, on May 13, 2021. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

92. Attached hereto as Exhibit 96 is a true and accurate copy of the transcript of the deposition of Sushil Jaiswal, on June 4, 2021. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

93. Attached hereto as Exhibit 97 is a true and accurate copy of the transcript of the deposition of Cesar Cedeno, on September 27, 2021. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

94. Attached hereto as Exhibit 98 is a true and accurate copy of the transcript of the deposition of Wayne Talton, on April 27, 2021. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

95. Attached hereto as Exhibit 99 is a true and accurate copy of the transcript of the deposition of Richard Derek Glover, on April 16, 2021 (“Vol. III”). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

96. Attached hereto as Exhibit 100 is a true and accurate copy of the transcript of the deposition of Daniel Barreto, on April 15, 2021 (“Vol. II”). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

97. Attached hereto as Exhibit 102 is a true and accurate copy of the FDA Webpage “FDA Updates and Press Announcements on Angiotensin II Receptor Blocker (ARB) Recalls (Valsartan, Losartan, and Irbesartan), available at: <https://www.fda.gov/drugs/drug-safety-and-availability/fda-updates-and-press-announcements-angiotensin-ii-receptor-blocker-arb-recalls-valsartan-losartan> (last accessed March 17, 2022).

98. Attached hereto as Exhibit 103 is a true and accurate copy of a certain FDA news release titled “FDA announces voluntary recall of several medicines containing

valsartan”, dated July 13, 2018, available at: <https://www.fda.gov/news-events/press-announcements/fda-announces-voluntary-recall-several-medicines-containing-valsartan-following-detection-impurity> (last accessed March 17, 2022).

99. Attached hereto as Exhibit 104 is a true and accurate copy of a certain FDA news release titled “FDA Statement on the FDA’s ongoing investigation into valsartan and ARB class impurities and the agency’s steps to address the root causes of the safety issues”, dated January 25, 2019, available at: <https://www.fda.gov/news-events/press-announcements/fda-statement-fdas-ongoing-investigation-valsartan-and-arb-class-impurities-and-agencys-steps> (last accessed March 17, 2022).

100. Attached hereto as Exhibit 105 is a true and accurate copy of a certain FDA news release titled “Laboratory analysis of valsartan products”, dated May 2, 2019, available at: <https://www.fda.gov/drugs/drug-safety-and-availability/laboratory-analysis-valsartan-products> (last accessed March 17, 2022).

101. Attached hereto as Exhibit 106 is a true and accurate copy of a certain European Medicines Agency statement titled “Lessons learnt from the presence of N-Nitrosamine impurities in sartan medicines”, dated June 23, 2020, available at: https://www.ema.europa.eu/en/documents/report/lessons-learnt-presence-n-nitrosamine-impurities-sartan-medicines_en.pdf (last accessed April 10, 2022).

102. Attached hereto as Exhibit 107 is a true and accurate copy of the Compliance Dashboard for Torrent Pharmaceuticals Limited on the FDA’s “Inspection Classification Database” website as of April 6, 2022, accessible through: <https://datadashboard.fda.gov/ora/cd/inspections.htm>.

103. Attached hereto as Exhibit 109 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of

Economic Loss Plaintiff Marilyn Andre with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

104. Attached hereto as Exhibit 110 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Sandy Bell with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

105. Attached hereto as Exhibit 111 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Alphonse Borkowski with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

106. Attached hereto as Exhibit 112 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Billy Joe Bruner with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

107. Attached hereto as Exhibit 113 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Joseph Cacaccio with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

108. Attached hereto as Exhibit 114 is a true and accurate copy of photographs of

prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Linda Crocker with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

109. Attached hereto as Exhibit 115 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Eric Erwin with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

110. Attached hereto as Exhibit 116 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Dennis Kaplan with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

111. Attached hereto as Exhibit 117 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Sandra Kelly with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

112. Attached hereto as Exhibit 118 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Joseph Kessinger with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

113. Attached hereto as Exhibit 119 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff James Lawson with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

114. Attached hereto as Exhibit 120 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Gerald Nelson with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

115. Attached hereto as Exhibit 121 is a true and accurate copy of photographs of prescription labels and/or bottles uploaded to MDL Centrality by Plaintiffs on behalf of Economic Loss Plaintiff Lawrence Semmel with the label “Proof of Use.” This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

116. Attached hereto as Exhibit 123 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Marlin Anderson, submitted in this litigation by CVS, dated December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

117. Attached hereto as Exhibit 124 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Marlin Anderson, submitted in this litigation by Walgreens, dated December 2, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the

Protective Order.

118. Attached hereto as Exhibit 125 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Marilyn Andre, submitted in this litigation by Express Scripts, dated November 23, 2021 and supplemented on April 1, 2022. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

119. Attached hereto as Exhibit 126 is a true and correct copy of Express Scripts pharmacy records for Economic Loss Plaintiff Marilyn Andre, submitted by Express Scripts on MDL Centrality on November 23, 2021 in this litigation. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

120. Attached hereto as Exhibit 127 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Marilyn Andre, submitted in this litigation for Sav-On Pharmacy (by Albertson’s LLC), dated November 23, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

121. Attached hereto as Exhibit 128 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Sandy Bell, submitted in this litigation by CVS, dated December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

122. Attached hereto as Exhibit 129 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Alphonse Borkowski, submitted in this litigation by Rite Aid, dated December 15, 2020. This document has been filed under seal because it contains

information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

123. Attached hereto as Exhibit 130 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Billy Joe Bruner, submitted in this litigation by CVS, dated November 24, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

124. Attached hereto as Exhibit 131 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Gary Burnett, submitted in this litigation by Walmart, dated December 28, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

125. Attached hereto as Exhibit 132 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Joseph Cacaccio, submitted in this litigation by Rite Aid, dated November 20, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

126. Attached hereto as Exhibit 133 is a true and correct copy of pharmacy records from Main Line Health Pharmacy for Economic Loss Plaintiff James Childs submitted on MDL Centrality on August 31, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

127. Attached hereto as Exhibit 134 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff James Childs, submitted in this litigation on MDL

Centrality on September 14, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

128. Attached hereto as Exhibit 135 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Samuel Cisneros, submitted in this litigation by Walmart, dated November 5, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

129. Attached hereto as Exhibit 136 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Glenda Cooper, submitted in this litigation on MDL Centrality on September 27, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

130. Attached hereto as Exhibit 137 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Linda Crocker, submitted in this litigation on MDL Centrality on September 27, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

131. Attached hereto as Exhibit 138 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Eleonora Deutenberg (Estate of) submitted in this litigation by CVS, dated December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

132. Attached hereto as Exhibit 139 is a true and correct copy of the Plaintiff Fact

Sheet for Economic Loss Plaintiff Eleonora Deutenberg (Estate of), submitted in this litigation on MDL Centrality on August 31, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

133. Attached hereto as Exhibit 140 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Eleonora Deutenberg (Estate of), submitted in this litigation by Walgreens, dated October 13, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

134. Attached hereto as Exhibit 141 is a true and correct copy of Beulaville Pharmacy records for Economic Loss Plaintiff Miranda Dudley submitted on MDL Centrality on September 13, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

135. Attached hereto as Exhibit 142 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Miranda Dudley, submitted in this litigation, dated October 25, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

136. Attached hereto as Exhibit 143 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff John Duffy, submitted in this litigation by Walgreens, dated November 25, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

137. Attached hereto as Exhibit 144 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Lawrence Edwards, submitted in this litigation by CVS, dated December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

138. Attached hereto as Exhibit 145 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Lawrence Edwards, submitted in this litigation by Rite Aid, dated October 28, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

139. Attached hereto as Exhibit 146 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Eric Erwin, submitted in this litigation by Walgreens, dated November 25, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

140. Attached hereto as Exhibit 147 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Leland Gildner, submitted in this litigation by Kroger, dated October 16, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

141. Attached hereto as Exhibit 148 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Marzanna Glab, submitted in this litigation by CVS, dated December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective

Order.

142. Attached hereto as Exhibit 149 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Mark Hays, submitted in this litigation by CVS, dated December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

143. Attached hereto as Exhibit 150 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Mark Hays, submitted in this litigation by Express Scripts, dated October 15, 2021 and supplemented on April 1, 2022. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

144. Attached hereto as Exhibit 151 is a true and correct copy of Express Scripts pharmacy records for Economic Loss Plaintiff Mark Hays submitted on MDL Centrality on October 18, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

145. Attached hereto as Exhibit 152 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Jennifer Johnson, submitted in this litigation by Walmart, dated November 1, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

146. Attached hereto as Exhibit 153 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Charles Johnston, submitted in this litigation by OptumRx, dated February 15, 2022. This document has been filed under seal because it contains

information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

147. Attached hereto as Exhibit 154 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Dennis Kaplan, submitted in this litigation by Rite Aid, dated November 20, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

148. Attached hereto as Exhibit 155 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Sandra Kelly, submitted in this litigation on MDL Centrality on November 16, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

149. Attached hereto as Exhibit 156 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Joseph Kessinger, submitted in this litigation by CVS, dated December 23, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

150. Attached hereto as Exhibit 157 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Asha Lamy, submitted in this litigation by Kroger, dated November 29, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

151. Attached hereto as Exhibit 158 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff James Lawson, submitted in this litigation by CVS, dated

December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

152. Attached hereto as Exhibit 159 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Jynona Lee, submitted in this litigation by Walmart, dated December 28, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

153. Attached hereto as Exhibit 160 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Veronica Longwell, submitted in this litigation by CVS, dated January 20, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

154. Attached hereto as Exhibit 161 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Veronica Longwell, submitted in this litigation by Express Scripts, dated November 25, 2020 and supplemented on April 1, 2022. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

155. Attached hereto as Exhibit 162 is a true and correct copy of Express Scripts pharmacy records for Economic Loss Plaintiff Veronica Longwell produced in this litigation as bates range LONGWELL000001 to LONGWELL000019 and marked at her deposition as Exhibit 7. This document was produced by Plaintiffs with redactions, and has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

156. Attached hereto as Exhibit 163 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Flora McGilvery, submitted in this litigation by Walmart, dated December 28, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

157. Attached hereto as Exhibit 164 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Mary McLean, submitted in this litigation by Express Scripts, dated December 27, 2021 and supplemented on April 1, 2022. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

158. Attached hereto as Exhibit 165 is a true and correct copy of Express Scripts pharmacy records for Economic Loss Plaintiff Mary McLean submitted on MDL Centrality on December 27, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

159. Attached hereto as Exhibit 166 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Mary McLean, submitted in this litigation on MDL Centrality on November 1, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

160. Attached hereto as Exhibit 167 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Jay Meader, submitted in this litigation by CVS, dated December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective

Order.

161. Attached hereto as Exhibit 168 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Jay Meader, submitted in this litigation on MDL Centrality on September 22, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

162. Attached hereto as Exhibit 169 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Brittney Means, submitted in this litigation by CVS, dated December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

163. Attached hereto as Exhibit 170 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Brittney Means, submitted in this litigation by Walgreens, dated October 13, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

164. Attached hereto as Exhibit 171 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Ronald Molinaro, submitted in this litigation by CVS, dated November 20, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

165. Attached hereto as Exhibit 172 is a true and correct copy of Lonesome Pine Economy Drug pharmacy records for Economic Loss Plaintiff Cheryl Mullins, produced in this litigation and identified by bates range MULLINS000001 to MULLINS000058. This

document was produced by Plaintiffs with redactions and has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

166. Attached hereto as Exhibit 173 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Cheryl Mullins, submitted in this litigation, dated February 3, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

167. Attached hereto as Exhibit 174 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Talsie Neal, submitted in this litigation by Walmart, dated December 28, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

168. Attached hereto as Exhibit 175 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Gerald Nelson, submitted in this litigation by CVS, dated November 24, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

169. Attached hereto as Exhibit 176 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Gerald Nelson, submitted in this litigation by Rite Aid, dated November 20, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

170. Attached hereto as Exhibit 177 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Peter O’Brien, submitted in this litigation by CVS, dated

December 17, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

171. Attached hereto as Exhibit 178 is a true and correct copy of Hephzibah Pharmacy records for Economic Loss Plaintiff Lubertha Powell, obtained in connection with this litigation and identified by bates range LPowell-HephPharm-000001 to LPowell-HephPharm-000007, which was also marked as Exhibit 6 at the deposition of Lubertha Powell. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

172. Attached hereto as Exhibit 179 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Lubertha Powell, submitted in this litigation filed on MDL Centrality on February 3, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

173. Attached hereto as Exhibit 180 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Lubertha Powell, submitted in this litigation by Walgreens, dated November 25, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

174. Attached hereto as Exhibit 181 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Robin Roberts, submitted in this litigation by Walgreens, dated November 25, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

175. Attached hereto as Exhibit 182 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Robin Roberts, submitted in this litigation by Walmart, dated December 28, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

176. Attached hereto as Exhibit 183 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Lawrence Semmel, submitted in this litigation by CVS, dated January 20, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

177. Attached hereto as Exhibit 184 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Lawrence Semmel, submitted in this litigation on MDL Centrality on June 11, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

178. Attached hereto as Exhibit 185 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Radhakrishna Shetty, submitted in this litigation by Walgreens, dated October 26, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

179. Attached hereto as Exhibit 186 is a true and correct copy of Heights Specialty Pharmacy records for Economic Loss Plaintiff Antoinette Sims submitted on MDL Centrality on September 21, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the

Protective Order.

180. Attached hereto as Exhibit 187 is a true and correct copy of the Plaintiff Fact Sheet for Economic Loss Plaintiff Antoinette Sims, submitted in this litigation on MDL Centrality on September 21, 2021. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

181. Attached hereto as Exhibit 188 is a true and correct copy of the Defendant Fact Sheet for Economic Loss Plaintiff Brian Wineinger, submitted in this litigation by Walmart, dated December 28, 2020. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

182. Attached hereto as Exhibit 189 is a true and accurate copy of the Expert Report of Michael Bottorff, Pharm. D., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

183. Attached hereto as Exhibit 190 is a true and accurate copy of the Expert Report of David Chan, M.D., Ph.D., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

184. Attached hereto as Exhibit 191 is a true and accurate copy of the Expert Declaration of Punam A. Keller, Ph.D., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has

been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

185. Attached hereto as Exhibit 192 is a true and accurate copy of the Expert Report of Timothy E. Kosty, R.Ph., M.B.A., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

186. Attached hereto as Exhibit 193 is a true and accurate copy of the Expert Report of Lauren J. Stiroh, Ph.D., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

187. Attached hereto as Exhibit 194 is a true and accurate copy of the Expert Report of David L. Chesney, MSJ, dated January 12, 2022 and disclosed by Defendant ZHP in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

188. Attached hereto as Exhibit 195 is a true and accurate copy of the Expert Report of William J. Lambert, Ph.D., dated January 12, 2022 and disclosed by Defendant Aurobindo in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

189. Attached hereto as Exhibit 196 is a true and accurate copy of the Expert Report of Eric Sheinin, Ph.D., dated January 12, 2022 and disclosed by Defendant Mylan in this

litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

190. Attached hereto as Exhibit 197 is a true and accurate copy of the Expert Report of Timothy Anderson, M.S., M.B.A., dated January 12, 2022 and disclosed by Defendant Teva in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

191. Attached hereto as Exhibit 198 is a true and accurate copy of the Expert Report of Roger Lea Williams, M.D., dated January 12, 2022 and disclosed by Defendant Teva in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

192. Attached hereto as Exhibit 199 is a true and accurate copy of the Expert Report of Mark Robbins, Ph.D., J.D., dated January 12, 2022 and disclosed by Defendant Torrent in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

193. Attached hereto as Exhibit 200 is a true and accurate copy of the Expert Report of Karla V. Ballman, Ph.D., FASCO, dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B).

194. Attached hereto as Exhibit 201 is a true and accurate copy of the Expert Report of Ursina R. Teitelbaum, M.D., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B).

195. Attached hereto as Exhibit 202 is a true and accurate copy of the Expert Report of Lewis A. Chodosh, M.D., Ph.D., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B).

196. Attached hereto as Exhibit 203 is a true and accurate copy of the Supplemental Expert Report of John F. Flack, M.D., M.P.H., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B).

197. Attached hereto as Exhibit 204 is a true and accurate copy of the Expert Report of Steven W. Baertschi, Ph.D., dated January 12, 2022 and disclosed by Defendant Teva in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B).

198. Attached hereto as Exhibit 205 is a true and accurate copy of the transcript of the February 22, 2022 deposition of Defense Expert Karla Ballman.

199. Attached hereto as Exhibit 206 is a true and accurate copy of the transcript of the March 25, 2022 deposition of Defense Expert Michael Bottorff. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

200. Attached hereto as Exhibit 207 is a true and accurate copy of the transcript of the March 3, 2022 deposition of Defense Expert David Chan.

201. Attached hereto as Exhibit 208 is a true and accurate copy of the transcript of the March 10, 2022 deposition of Defense Expert Lewis Chodosh. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

202. Attached hereto as Exhibit 209 is a true and accurate copy of the transcript of the March 10, 2022 deposition of Defense Expert Punam Keller. This document has been filed with redactions to the extent it contains information that has been designated as

“PROTECTED INFORMATION” as defined in the Protective Order.

203. Attached hereto as Exhibit 210 is a true and accurate copy of the transcript of the February 24, 2022 deposition of Defense Expert Timothy Kosty. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

204. Attached hereto as Exhibit 211 is a true and accurate copy of the transcript of the March 25, 2022 deposition of Defense Expert Lauren Stiroh.

205. Attached hereto as Exhibit 212 is a true and accurate copy of the transcript of the March 10, 2022 deposition of Defense Expert Ursina Teitelbaum.

206. Attached hereto as Exhibit 213 is a true and accurate copy of the transcript of the March 9, 2022 deposition of Defense Expert Timothy Anderson. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

207. Attached hereto as Exhibit 214 is a true and accurate copy of the transcript of the March 23, 2022 deposition of Defense Expert Steven Baertschi. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

208. Attached hereto as Exhibit 215 is a true and accurate copy of the transcript of the March 21, 2022 deposition of Defense Expert Eric Sheinin. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

209. Attached hereto as Exhibit 216 is a true and accurate copy of the transcript of the February 17, 2022 deposition of Defense Expert Roger Williams.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: April 12, 2022

Respectfully submitted,

/s/ Tiffany M. Andras

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Teva Pharmaceutical Industries Ltd.,
Actavis LLC, and Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I, Tiffany M. Andras, an attorney, hereby certify that on April 12, 2022, I caused the foregoing Certification of Tiffany M. Andras to be served on all counsel of record via the Court's electronic filing service ("ECF").

By: /s/ Tiffany M. Andras